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January 24, 2017

**VIA ECF AND**  
**FACSIMILE (718-613-2125)**

Honorable Ramon E. Reyes  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East, Courtroom 2E North  
Brooklyn, NY 11201

**Re: Cano v. Nineteen Twenty Four, Inc., et al.**  
**Civil Action No. 15-cv-04082 (RRM)(RER)**

Dear Judge Reyes:

Our firm represents the Defendants in the above-referenced action. We write jointly with the Plaintiffs and counsel for the putative settlement class to respectfully request that the Fairness Hearing currently scheduled for March 30, 2017 at 11:00 AM be adjourned to a date occurring on or after April 17, 2017.

The parties request that the Court adjourn the Fairness Hearing due to the fact that notices to the appropriate State and Federal officials pursuant to the Class Action Fairness Act, 28 U.S.C. § 1711 *et seq.* ("CAFA") were served by the settlement administrator in this matter on January 17, 2017. (See ECF Docket No. 37.) CAFA requires that such notices to appropriate State and Federal officials must be submitted at least ninety (90) days prior to the order granting final approval of the proposed settlement. 28 U.S.C. § 1715(d). Unfortunately, the Fairness Hearing currently set by Your Honor falls only seventy-two (72) days after the date CAFA notices were served. The parties apologize to the Court for this inconvenience.

Accordingly, the parties respectfully request that the Fairness Hearing with respect to the settlement in this matter be adjourned to a date and time suitable to the Court on or after April 17, 2017. This is the first request for an adjournment to the Fairness Hearing and all parties consent to the same. The settlement notice approved by the Court has not yet been sent by the settlement administrator to the putative settlement class, therefore the settlement administrator

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may, subject to Your Honor's approval, simply incorporate the new Fairness Hearing date into the Notice prior to its distribution.

For the Court's convenience, the following dates are currently available to the parties for the rescheduled Fairness Hearing: April 24, 25, 26, 27, and 28, 2017. Should Your Honor have any questions or concerns regarding the foregoing request, please do not hesitate to contact the undersigned. Thank you for the Court's consideration of this request.

Respectfully submitted,

**FOX ROTHSCHILD LLP**

Alexander W. Leonard

cc: Taylor Graham, Esq. (by ECF)  
Carolyn D. Richmond, Esq. (Fox Rothschild LLP – NYC)